

1 William D. Hyslop
2 United States Attorney
3 Eastern District of Washington
4 Ian L. Garriques
5 Assistant United States Attorney
6 402 E. Yakima Ave., Suite 210
7 Yakima, WA 98901
8 Telephone: (509) 454-4425

FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

Feb 09, 2021

SEAN F. MCAVOY, CLERK

9 UNITED STATES DISTRICT COURT
10 FOR THE EASTERN DISTRICT OF WASHINGTON

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 NOE RUBIO-FARIAS, and
15 ROMAN BERUMEN PEREZ,

16 Defendants.

1:21-CR-2009-SAB
INDICTMENT

Vio: 21 U.S.C. §§ 841(a)(1),
(b)(1)(B)(viii), 846
Conspiracy to Distribute 5
Grams or More of Actual
(Pure) Methamphetamine
(Count 1)

21 U.S.C. § 841(a)(1),
(b)(1)(B)(viii)
Distribution of 5 Grams or
More of Actual (Pure)
Methamphetamine
(Counts 2-4)

21 U.S.C. § 853
Forfeiture Allegations

23 The Grand Jury charges:

24 COUNT 1

25 Beginning on or about a date unknown, but at least by on or about July 8,
26 2020, and continuing until on or about December 8, 2020, in the Eastern District of
27 Washington, and elsewhere, the Defendants, NOE RUBIO-FARIAS and ROMAN
28

INDICTMENT – 1

1 BERUMEN PEREZ, knowingly and intentionally combined, conspired,
2 confederated and agreed together and with other persons, both known and
3 unknown, to commit the following offense: distribution of 5 grams or more of
4 actual (pure) methamphetamine, a Schedule II controlled substance, in violation of
5 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(viii), 846.
6
7

8 COUNT 2

9
10 On or about July 8, 2020, in the Eastern District of Washington, the
11 Defendant, NOE RUBIO-FARIAS, did knowingly and intentionally distribute 5
12 grams or more of actual (pure) methamphetamine, a Schedule II controlled
13 substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(B)(viii).
14

15 COUNT 3

16
17 On or about August 25, 2020, in the Eastern District of Washington, the
18 Defendant, NOE RUBIO-FARIAS, did knowingly and intentionally distribute 5
19 grams or more of actual (pure) methamphetamine, a Schedule II controlled
20 substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(B)(viii).
21

22 COUNT 4

23
24 On or about December 8, 2020, in the Eastern District of Washington, the
25 Defendants, NOE RUBIO-FARIAS and ROMAN BERUMEN PEREZ, did
26 knowingly and intentionally distribute 5 grams or more of actual (pure)
27
28

1 methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. §
2 841(a)(1), (b)(1)(B)(viii).
3

4 NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

5 The allegations contained in this Indictment are hereby re-alleged and
6
7 incorporated by reference for the purpose of alleging forfeitures.

8 Pursuant to 21 U.S.C. § 853, upon conviction of an offense in violation of 21
9
10 U.S.C. §§ 841(a)(1), (b)(1)(B)(viii), 846, as set forth in Count 1 of this Indictment,
11 the Defendants, NOE RUBIO-FARIAS, and ROMAN BERUMEN PEREZ, shall
12
13 forfeit to the United States of America, any property constituting, or derived from,
14
15 any proceeds obtained, directly or indirectly, as the result of such offense and any
16
17 property used or intended to be used, in any manner or part, to commit or to
18
19 facilitate the commission of the offense, including, but not limited to the following
20
21 listed property:

22 DEFENDANT NOE RUBIO-FARIAS

23 - \$6,093.00 U.S. currency, seized by the United States Drug
24
25 Enforcement Administration, on or about January 21, 2021, pursuant
26
27 to a search warrant at the residence of NOE RUBIO-FARIAS;

28 - Louis Vuitton, Burberry, and Tory Burch handbags, seized by the
United States Drug Enforcement Administration, on or about January
21, 2021, pursuant to a search warrant at the residence of NOE
RUBIO-FARIAS;

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1 DEFENDANT ROMAN BERUMEN PEREZ

2 - Glock 22, .40 caliber firearm, bearing serial number KE2264, seized
3 by the United States Drug Enforcement Administration, on or about
4 January 21, 2021, pursuant to a search warrant at the residence of
5 ROMAN BERUMEN PEREZ;

6 If any of the property described above, as a result of any act or omission of
7 the Defendants:

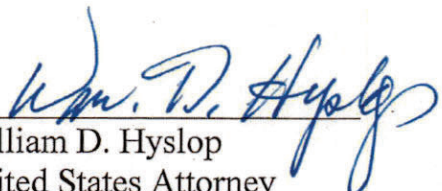
- 8
- 9 a. cannot be located upon the exercise of due diligence;
 - 10 b. has been transferred or sold to, or deposited with, a third party;
 - 11 c. has been placed beyond the jurisdiction of the court;
 - 12 d. has been substantially diminished in value; or
 - 13 e. has been commingled with other property which cannot be divided
14 without difficulty,

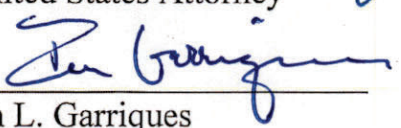
15 the United States of America shall be entitled to forfeiture of substitute property
16 pursuant to 21 U.S.C. § 853(p).

17
18 DATED this 9 day of February 2021.

19
20 A TRUE BILL.

21
22 * Foreperson

23 
24 William D. Hyslop
25 United States Attorney

26 
27 Ian L. Garriques
28 Assistant United States Attorney